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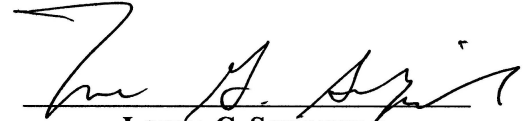
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Application **GRANTED**. Discovery is **STAYED** pending a decision on the motion to dismiss.

Dated: May 25, 2022
New York, New York

May 23, 2022

Via ECF


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

The Honorable Lorna G. Schofield
United States District Court for the Southern District of New York
40 Foley Square, Courtroom 1106
New York, NY 10007

Re: *Lee v. Yang et al.*, Case No. 1:21-cv-07934-LGS
Letter Motion to Stay Discovery, on Consent of All Parties

Dear Judge Schofield:

On behalf of Defendants Andrew Yang and the Friends of Andrew Yang (“FOAY”) (together, “Defendants”), we write pursuant to the Court’s Individual Rules of Civil Practice III.A to respectfully request a stay of discovery pending resolution of Defendants’ anticipated motion to dismiss. *See* Dkt. No. 56. Counsel for Plaintiff Erica Lee consents to the requested stay of discovery.

Compelling reasons exist to stay discovery in this matter. Defendants will move to dismiss all of Plaintiff’s claims as a matter of law on June 10, and the motion will be fully briefed by July 12. Defendants contend that all of Plaintiff’s claims fail as a matter of law, and thus discovery while the motion to dismiss is pending would not be a good use of the parties’ resources and not in the interest of judicial economy. *See, e.g., Page v. Oath Inc.*, No. 17 CIV. 6990 (LGS), 2018 WL 1406621, at *4 (S.D.N.Y. Mar. 20, 2018) (staying discovery pending resolution of motions to dismiss for lack of jurisdiction) (Schofield, J.) *aff’d sub nom. Page v. United States Agency for Glob. Media*, 797 F. App’x 550 (2d Cir. 2019); *Kewazinga Corp. v. Google LLC*, No. 20 CIV. 1106 (LGS), 2021 WL 466877, at *1 (S.D.N.Y. Feb. 9, 2021) (referencing stay of discovery pending dispositive motions).

Moreover, Defendants are concerned about the premature disclosure of potentially sensitive and confidential information in this matter, where a dismissal may be issued in short order as a matter of law. Before any discovery is produced, an appropriate protective order would need to be negotiated between the parties and approved by the Court.

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Respectfully,

HOLLAND & KNIGHT LLP

/s Qian Shen

Qian (Sheila) Shen

CC: All counsel of record (*via ECF*)